

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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|----------------------------|---|-------------------------|
| IN RE: |) | CASE NO. 05-44481 (RDD) |
| |) | |
| DELPHI CORPORATION, et al. |) | CHAPTER 11 |
| |) | |
| Debtors |) | (Jointly Administered) |

RESPONSE OF VECTOR CANTECH, INC.
TO DEBTORS' NINETEENTH OMNIBUS
OBJECTION (SUBSTANTIVE) TO CERTAIN CLAIMS

Creditor, Vector CANtech, Inc. ("Creditor" or "Vector"), hereby submits its Response to the Debtors' Nineteenth Omnibus Objection (Substantive) to Certain Claims. In support of this Response, Vector states as follows:

Factual Background

1. On July 21, 2006, Vector filed a Proof of Claim in connection with the Debtors' bankruptcy cases. The Proof of Claim, docketed as claim no. 14065, is in the amount of \$267,735.70 ("Claim").
2. Vector documented its Proof of Claim with lists of unpaid invoices, copies of purchase orders, related invoices and proofs of delivery.
3. Vector also negotiated with the Debtors a reclamation claim which has priority status. The reclamation claim amount was included in the Proof of Claim. In June of 2006, Vector agreed with the Debtors that it had a total reclamation claim allowable under section 546(c) of the Bankruptcy Code in the amount of \$28,846.40 ("Reclamation Claim").

The Debtors' Objection

4. On or about July 13, 2007, the Debtors filed their Nineteenth Omnibus Objection to Certain Claims ("Nineteenth Omnibus Claims Objection") including the Claim filed by Creditor.

5. The asserted basis by the Debtors for objecting to the Claim is that the Claim should be reduced and reclassified, with part of the reduced amount recognized as a priority claim, and the balance recognized as a general unsecured claim.

6. The Debtor's Nineteenth Claims Objection does not, however, provide any documentation or other basis for why the Vector claim should be reduced in total amount.

Relief Requested

7. Vector concedes that the Claim should be reclassified to show the amount of the Claim which is the Reclamation Claim entitled to priority, and which amount is a general unsecured claim without priority.

8. Vector further agrees with the Debtors' treatment of a \$28,846.40 portion of the Claim as a Reclamation Claim entitled to priority.

9. Vector does not agree, however, with the reduction proposed by the Debtors to the total amount of the Claim or the unsecured portion of the Claim. Indeed, Vector believes that it has properly documented its Claim, and that the total amount as set forth in the Proof of Claim is valid against each of the respective Debtors' estates.

10. Vector is willing to work with the Debtors to reconcile the general unsecured portion of its Claim, but has not been able to do so prior to the response date for the Nineteenth Omnibus Claims Objection.

11. Vector therefore respectfully asks this Court to allow the Debtors' Objection as to its Claim insofar as it would reclassify the Claim by specifying a portion of the total amount as a Reclamation Claim entitled to priority, as per the Debtors' proposed reclassification. Vector also respectfully asks this Court to deny the Debtors' Nineteenth Omnibus Claims Objection insofar as it would reduce the total amount the Vector Claim and the unsecured portion of that Claim.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response of Vector CANtech, Inc. to Debtors' Nineteenth Omnibus Objection (Substantive) to Certain Claims was filed electronically on August 9, 2007. Notice of this filing will be sent electronically to all parties by operation of the Court's electronic filing system or by Ordinary U.S. Mail, postage prepaid, upon all parties who made an appearance in this action. A copy of the foregoing Response will also be sent via overnight delivery to:

The Honorable Robert D. Drain
United States Bankruptcy Judge
United States Bankruptcy Court for the
Southern District of New York
One Bowling Green, Room 632
New York, NY 10004

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